

FILED

JUL -6 2016

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LACIA ALLEN,

Defendant.

No.

**4:16CR00281 SNLJ/PLC**

**INDICTMENT**

**COUNTS 1-3**

**Title 18, United States Code, Section 641 and Section 2**  
**Theft of Government Property or Funds**

The Grand Jury charges that:

**BACKGROUND**

1. At all times relevant to this indictment, defendant Lacia Allen, a resident of St. Louis, Missouri, was not working or enrolled in college classes. At all times relevant to this indictment, Lacia Allen had one child, J.C. A second child, C.T, was born in 2015.

**Relevant Child Care Assistance Program Provisions**

2. The Child Care and Development Block Grant Act provides federal block grants to states, territories, and tribes for child care assistance to low income families. The United States Department of Health and Human Services, Office of the Administration for Children and Families, administers the Child Care and Development Fund ("CCDF") at the federal level. The stated purpose of the CCDF is to enable low-income families to obtain and retain employment or the skills and education necessary to obtain employment.

3. The Missouri Department of Social Services (“DSS”), Family Support Division (“FSD”), is responsible for the Child Care and Development Program in Missouri. Missouri contributes to the child care assistance program through its Early Childhood and Development fund and state general revenue.

#### Eligibility

4. Each state administering child care assistance programs, under a federal CCDF grant, determines the eligibility requirements for families within the state. To be eligible for the Missouri Child Care Assistance program, applicants must be low-income, have children, and be working, disabled, or enrolled in qualified education or job training programs. When an individual is found eligible for the child care assistance program, DSS will provide financial assistance for child care for an individual child by paying the full or partial child care costs.

#### Application for Child Care Assistance

5. To receive child care assistance, the applicant must submit an application, in-person, online, or by mail, to a local FSD office. During the application process, the applicant completes and signs a Child Care Application or a Child Care Reapplication/ Review Form. The applicant must provide his or her contact information, the names of the children, the names and addresses of the child care providers, and the need for child care, including In School. By signing the Child Care Application or Child Care Reapplication/Review Form, the applicant certifies that the answers he or she provided are true, correct, and complete statements, that the applicant agrees to provide additional verification or information as requested, and that the applicant understands his or her statements are subject to investigation and verification.

6. During the period relevant to this indictment, defendant Lacia Allen submitted certified Child Care Application forms to the FSD office on three occasions and submitted one Child Care Reapplication/Review Form to the FSD office.

7. The applicant for child care assistance is also interviewed as part of the application process. After the interview, an Interview Summary is generated, which the applicant must certify. The Interview Summary contains the applicant's contact information, the names of the children, and the stated child care need. By signing the Interview Summary, the applicant certifies that the answers he or she provided are true, accurate, and complete. During the period relevant to this indictment, defendant Lacia Allen submitted certified Interview Summary forms to the FSD office on two occasions.

#### Child Care Verification and Reimbursement

8. The FSD office requires verification of child care need. In general, verification requires proof of work or school schedule, and for college students, proof of financial aid. During the period relevant to this indictment, defendant Lacia Allen submitted proof of enrollment in college classes to the FSD office on nine occasions and submitted a Verification Request Form to the FSD office on one occasion.

9. Child care payments, totaling \$26,794.32, were made on the behalf of Lacia Allen's child, J.C., for service months April 2013 through November 2015 and on the behalf of Lacia Allen's child, C.T., for service months April 2015 through October 2015.

#### **DESCRIPTION OF FRAUD**

10. Beginning in or about 2013 and continuing to in or about February 2016, defendant Lacia Allen knowingly submitted false and fraudulent class schedules to FSD, as proof

of her enrollment in college classes. Lacia Allen knew at the time she submitted the class schedules that she was not enrolled or attending the classes listed on the schedules. Some of these false schedules and documents are described below.

St. Louis Community College

11. Records reflect that defendant Lacia Allen was enrolled in college courses at St. Louis Community College in the 2012 fall semester and at no other time. On or about the dates indicated below, Lacia Allen submitted to FSD false and fraudulent class schedules as proof of her need for child care:

<b>Date</b>	<b>Type of Document</b>	<b>False Statement</b>
June 3, 2013	Class schedule – Forest Park	Course period: May-December 2013
June 24, 2013	Certified Child Care Application	Child care need: “School”
June 2, 2015	Child Care Reapplication/ Review Form	Child care need: “School” at “Forest Park”
June 2, 2015	Class schedule – Forest Park	Course period: June-November 2015
January 11, 2016	Class schedule – Forest Park	Course period: January-May 2016
January 25, 2016	Certified Interview Summary	Child care need: “College”
January 25, 2016	Class schedule – Forest Park	Course period: January-May 2016

University of Phoenix

12. Records reflect that defendant Lacia Allen was enrolled in college courses at the University of Phoenix between October 15, 2012 and March 4, 2013 and at no other time. On or about the dates indicated below, Lacia Allen submitted to FSD false and fraudulent documents as proof of her need for child care:

<b>Date</b>	<b>Type of Document</b>	<b>False Statement</b>
July 3, 2013	Financial aid award letter – University of Phoenix	Course period: May-December 2013
July 3, 2013	Class schedule – University of Phoenix	Course period: June 2013-January 2014
July 8, 2013	Child Care Schedule Verification Request Form	Class hours at the University of Phoenix for the course period June 2013-January 2014
March 11, 2014	Class schedule – University of “Pheonix”	Course period: January-May 2014
July 24, 2014	Class schedule – University of “Pheonix”	Course period: August-November 2014

St. Louis University

13. Records reflect that defendant Lacia Allen was never enrolled and never attended college courses at St. Louis University. On or about the dates indicated below, Lacia Allen submitted to FSD false and fraudulent documents as proof of her need for child care:

<b>Date</b>	<b>Type of Document</b>	<b>False Statement</b>
October 28, 2015	Child Care Schedule Verification Request Form	Class hours at St. Louis University
October 28, 2015	Class schedule – St. Louis University	Course period: Spring 2016
November 2, 2015	Certified Child Care Application	Child care need: “School” at “SLU”
Noyember 2, 2015	Class schedule – St. Louis University	Course period: Spring 2016

14. On about the dates listed below, within the Eastern District of Missouri,

**LACIA ALLEN,**

the defendant herein, did embezzle, steal, purloin, and knowingly convert to her use money and items of the United States and of any department or agency thereof, and any property made or being made under contract for the United States and any department or agency thereof, to wit: government funds, in excess of \$1000, in the amounts listed below:

<u>COUNT</u>	<u>PAYMENT DATE</u>	<u>PAID AMOUNT</u>
1	July 2015	\$1302.26
2	August 2015	\$1198.68
3	September 2015	\$1255.76

In violation of Title 18, United States Code, Section 641 and Section 2.

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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DOROTHY L. McMURTRY, #37727MO  
Assistant United States Attorney